

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CONVERGEN ENERGY LLC, L'ANSE WARDEN  
ELECTRIC COMPANY, LLC, EUROENERGY  
BIOGAS LATVIA LIMITED, and LIBRA CAPITAL  
US, INC.

Plaintiffs,

-against-

STEVEN J. BROOKS, NIAN TICVISTA ENERGY  
LLC, GREGORY MERLE, RIVERVIEW ENERGY  
CORPORATION, DANIEL ESCANDON GARCIA,  
RAMON URIARTE INCHAUSTI, CHIPPER  
INVESTMENT SCR, SA, URINCHA SL, THEODORE  
JOHN HANSEN, BRIAN R. MIKKELSON, and  
CONVERGEN ENERGY WI, LLC,

Defendants.

Index No. **1:20-cv-03746** (LJL)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE, that upon the memorandum of law in support of its motion for alternative service, dated June 18, 2020 the accompanying declaration of Dov Gold, plaintiffs Convergen Energy LLC, L'anse Warden Electric Company, LLC, Euroenergy Biogas Latvia Limited, and Libra Capital US, Inc ("Plaintiffs") will move this court, before Hon. Lewis J. Liman, at the federal courthouse located at 500 Pearl Street, New York, New York, 10007 on a date to be set by the court for an order pursuant to Rules 4(f) and 4(h)(2) of the Federal Rules of Civil Procedure, granting Plaintiffs' motion for alternative service of the English and Spanish translation of the summons and complaint on Defendants Daniel Escandon Garcia, Ramon Uriarte Inchausti, Chipper Investment SCR, SA, and Urincha SL by personal service, email, postal channels, or on their counsel by email.

Dated: June 18, 2020  
New York, New York

SEIDEN LAW GROUP, LLP

By:       /s/ Dov Gold        
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Dov B. Gold  
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